

Patrick J. Neligan, Jr.
State Bar. No. 14866000
Douglas J. Buncher
State Bar No. 03342700
John D. Gaither
State Bar No. 24055516
NELIGAN LLP
325 North St. Paul, Suite 3600
Dallas, Texas 75201
Telephone: 214-840-5333
Facsimile: 214-840-5301
pneligan@neliganlaw.com
dbuncher@neliganlaw.com
jgaither@neliganlaw.com

Gregory E. Garman
Nevada Bar No. 6654 (*admitted pro hac vice*)
William M. Noall
Nevada Bar No. 3549 (*admitted pro hac vice*)
Gabrielle A. Hamm
Texas Bar No. 24041047
GARMAN TURNER GORDON LLP
7251 Amigo Street, Suite 210
Las Vegas, Nevada 89119
Telephone: 725-777-3000
Facsimile: 725-777-3112
ggarman@gtg.legal
wnoall@gtg.legal
gamm@gtg.legal

COUNSEL FOR THE DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	Jointly Administered

AMENDED NOTICE OF RESET HEARING

PLEASE TAKE NOTICE that a hearing on the following pleadings has been reset for
Thursday, March 9, 2021 at 1:30 p.m. Central Time before the Honorable Harlin D. Hale:

1. Debtors' Emergency Motion For Authority To Continue Use Of Existing Cash Management System, Maintain Existing Bank Accounts, Pay Certain Costs And Fees Associated With Credit Card Transactions, And Continue Use Of Existing Business Forms [Docket No. 5]; and
2. Debtors' Motion for Waiver of the Requirements of Section 345(b) [Docket No. 78].

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

PLEASE TAKE FURTHER NOTICE that this hearing will be conducted by videoconference and teleconference via Webex. To access Judge Hale's Courtroom for the hearing use the following link: <https://us-courts.webex.com/meet/hale>. Parties wishing to participate via teleconference may dial-in at 1-650-479-3207, access code 476 420 189. Parties attending the hearing are requested to include their names on the Court's electronic sign-in sheet located on Judge Hale's web page under "Electronic Appearances" located at the following link: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-hales-hearing-dates>. Parties should also review, prior to the hearing, the Webex Hearing Instructions attached hereto.

Dated: March 5, 2021

Respectfully submitted,

/s/ Patrick J. Neligan, Jr.

Patrick J. Neligan, Jr.

State Bar. No. 14866000

Douglas J. Buncher

State Bar No. 03342700

John D. Gaither

State Bar No. 24055516

NELIGAN, LLP

325 North St. Paul, Suite 3600

Dallas, Texas 75201

Telephone: 214-840-5333

Facsimile: 214-840-5301

pneligan@neliganlaw.com

dbuncher@neliganlaw.com

jgaither@neliganlaw.com

and

Gregory E. Garman

Nevada Bar No. 6654 (*admitted pro hac vice*)

William M. Noall

Nevada Bar No. 3549 (*admitted pro hac vice*)

Gabrielle A. Hamm

Texas Bar No. 24041047

GARMAN TURNER GORDON LLP

7251 Amigo Street, Suite 210

Las Vegas, Nevada 89119

Telephone: 725-777-3000
Facsimile: 725-777-3112
ggarman@gtg.legal
wnoall@gtg.legal
ghamm@gtg.legal

COUNSEL FOR THE DEBTORS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 25th day of February 2021, a true and correct copy of the foregoing was served via first class U.S. mail on the parties named on the attached Master Service List.

/s/ John D. Gaither
John D. Gaither

WebEx Hearing Instructions

Judge Harlin D. Hale

Pursuant to General Order 2020-14 issued by the Court on May 20, 2020, all hearings before Judge Harlin D. Hale are currently being conducted by WebEx videoconference unless ordered otherwise.

For WebEx Video Participation/Attendance:

Link: <https://us-courts.webex.com/meet/hale>

For WebEx Telephonic Only Participation/Attendance:

Dial-In: 1-650-479-3207

Access code: 476 420 189

Participation/Attendance Requirements:

- Counsel and other parties in interest who plan to actively participate in the hearing are encouraged to attend the hearing in the WebEx video mode using the WebEx video link above. Counsel and other parties in interest who will not be seeking to introduce any evidence at the hearing and who wish to attend the hearing in a telephonic only mode may attend the hearing in the WebEx telephonic-only mode using the WebEx dial-in and access code above.
- Attendees should join the WebEx hearing at least 10 minutes prior to the hearing start time. Please be advised that a hearing may already be in progress. During hearings, participants are required to keep their lines on mute at all times that they are not addressing the Court or otherwise actively participating in the hearing. The Court reserves the right to disconnect or place on permanent mute any attendee that causes any disruption to the proceedings. For general information and tips with respect to WebEx participation and attendance, please see Clerk's Notice 20-04: https://www.txnb.uscourts.gov/sites/txnb/files/hearings/Webex%20Information%20and%20Tips_0.pdf
- **Witnesses are required to attend the hearing in the WebEx video mode, and live testimony will only be accepted from witnesses who have the WebEx video function activated.** Telephonic testimony without accompanying video will not be accepted by the Court. The Court may consider special requests for other appearance options on a case-by case-basis.
- All WebEx hearing attendees are required to comply with Judge Hale's Telephonic and Videoconference Hearing Policy (included within Judge Hale's Judge-Specific Guidelines): <https://www.txnb.uscourts.gov/content/judge-harlin-d-hale>

Exhibit Requirements:

- Any party intending to introduce documentary evidence at the hearing must file an exhibit list in the case with a true and correct copy of each designated exhibit filed as a separate, individual attachment thereto so that the Court and all participants have ready access to all designated exhibits.

Notice of Hearing Content and Filing Requirements:

IMPORTANT: For all hearings that will be conducted by WebEx only:

- The Notice of Hearing filed in the case and served on parties in interest must: (1) provide notice that the hearing will be conducted by WebEx videoconference only, (2) provide notice of the above WebEx video participation/attendance link, and (3) attach a copy of these WebEx Hearing Instructions or provide notice that they may be obtained from Judge Hale's hearing/calendar site: <https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-hales-hearing-dates>
- When electronically filing the Notice of Hearing via CM/ECF select "at https://us-courts.webex.com/meet/hale" as the location of the hearing (note: this option appears immediately after the first set of Wichita Falls locations). Do not select Judge Hale's Dallas courtroom as the location for the hearing.

CONNECTION INSTRUCTIONS FOR PARTICIPATING IN A WEBEX VIRTUAL HEARING

The court will allow participation in a virtual hearing using either of the following two methods. Please connect at least 10 minutes prior to the hearing time. It is recommended that attorneys discuss the logistics of the WebEx appearance with their clients/witnesses at least 48 hours before the hearing.

Option 1: Using the WebEx app on your smartphone, tablet, laptop, or desktop.

Please connect using only one device. Using two or more devices may cause audio feedback issues.

If using a phone or tablet for video, it should be set in a stationary position. Holding a phone or tablet in your hand while speaking does not yield a good video for the court.

NOTE: If you are experiencing audio issues when using the WebEx application, you may use the “Call Me At” selection under “Audio Connection” to move just the audio portion of the WebEx conference to your telephone.

Option 2: Call in via phone (audio only).

Webex dial-in number: 1-650-479-3207 (access code: 476 420 189).

HELPFUL HINTS AND ETIQUETTE

- Please use the mute function when you are not speaking. Please be aware that sometimes the court mutes everyone when there is background noise. When you want to speak, make sure you are not on mute. Call-in users should dial *6 to unmute your line.
- Remember to state your name for the record each time before speaking and speak slowly and clearly so the Court can get a good record.
- Use headphones whenever possible, especially if using a desktop PC with external speakers. We have found that newer iPhones provide the best visual and audio feed – better than most desktop computers. If you are on a personal computer, headphones or earbuds are required for those who need to speak during the hearing.
- During examination, attorneys and witnesses should use a separate camera and microphone when possible. To avoid feedback, parties using separate devices must not be in the same room. The Court may consider special requests on a case-by-case basis.
- WebEx participants may use the "share" button to easily share their screen or document with the Court or other WebEx participants. Press “stop sharing” to remove the presentation from the meeting.
- When making an appearance from a vehicle, please park in a safe location with windows rolled up (to minimize background distraction and noise) and use a headset that is ear-to-phone (not the vehicle’s hands-free speaker-phone option).
- Suggestions for participating in a WebEx hearing from home: If you are having connectivity problems, turn off devices that may be using bandwidth on your home network. Devices or applications such as Facetime, Roku, streaming media players, video games, or large downloads can negatively impact the audio and video quality of the WebEx meeting.
- Participants are reminded that they should wear attire suitable for court.
- Participants who wish to test their WebEx connection or the share screen functionality in advance of the hearing may arrange a “practice run” by contacting the courtroom deputy.

EXHIBITS AND DEMONSTRATIVE AIDS

Exhibits should be filed ahead of time by the date that they would normally be exchanged pursuant to our local rules using the "list (witness/exhibit/generic)" OR "notice (generic)" OR "Support/Supplemental

Demonstrative aids and Power Points should also be filed prior to the hearing, if possible. If not, WebEx has the ability to allow you to share your screen, or a particular document, with everyone in the hearing. If these documents are admitted as exhibits, they would then have to be filed after the hearing.

During the hearing, lawyers can refer to (and offer) their exhibits by referencing the exhibit's docket number for the court and all to access. After the hearing, the court will create a Minute Entry reflecting which exhibits were admitted. You should consider emailing exhibits to witnesses ahead of time since they may not have access to PACER.

In re: Sea Girt LLC - Case No. 21-30080
In re: National Rifle Association of America - Case No. 21-30085

MASTER SERVICE LIST

Debtor/Debtor's Counsel

National Rifle Association of America
11250 Waples Mill Road
Fairfax, VA 22030

Neligan LLP
Attn: Patrick J. Neligan
Douglas J. Buncher
John D. Gaither
325 N. St. Paul, Suite 3600
Dallas, TX 75201
Email: pneligan@neliganlaw.com
dbuncher@neliganlaw.com
jgaither@neliganlaw.com

Sea Girt LLC
11250 Waples Mall Road
Fairfax, VA 22030

U.S. Trustee

Office of the United States Trustee
Attn: Lisa Young
Earle Cabell Federal Building
1100 Commerce Street, Room 976
Dallas, TX 75242

Secured Creditors

Atlantic Union Bank
Attn: Andrew Kalin
1800 Robert Fulton Drive, Suite 100
Reston, VA 20191
Email: andrew.kalin@atlanticunionbank.com

Counsel For Official Committee of Unsecured Creditors

Louis R. Strubeck, Jr.
Kristian W. Gluck
Scott P. Drake
Laura L. Smith
Nick Hendrix
Norton Rose Fulbright US LLP
2200 Ross Avenue, Suite 3600
Dallas, TX 75201-7932
louis.strubeck@nortonrosefulbright.com
kristian.gluck@nortonrosefulbright.com
laura.smith@nortonrosefulbright.com
scott.drake@nortonrosefulbright.com
nick.hendrix@nortonrosefulbright.com

20 Largest Unsecured Creditors

Ackerman McQueen, Inc.
1601 Northwest Expressway
Oklahoma City, OK 73118-1438

Membership Marketing Partners LLC
11250 Waples Mill Road, Suite 310
Fairfax, VA 22030

Gould Paper Corporation
Attn: Warren Connor
99 Park Avenue, 10th Floor
New York, NY 10016

Infocision Management Corp.
325 Springside Drive
Akron, OH 44333

Under Wild Skies
c/o Dycio & Biggs
10533 Main Street
Fairfax, VA 22030

Valtim Incorporated
P.O. Box 114
Forest, VA 24551

Quadgraphics
N63W23075 Hwy. 74
Sussex, WI 53089

Communications Corp of America
Attn: Ken Bentley
13129 Airpark Drive, Suite 120
Elkwood, VA 22718

Membership Advisors Public REL
11250 Waples Mill Road, Suite 310
Fairfax, VA 22030

Salesforce.Com, Inc.
One Mark St. – The Landmark, Suite 300
San Francisco, CA 94105

Mercury Group
1601 NW Expressway, Suite 1100
Oklahoma City, OK 73118

Speedway Motorsports, Inc.
P.O. Box 600
Concord, NC 28026

Image Direct Group LLC
200 Monroe Avenue, Building 4
Frederick, MD 21701

Google
1600 Amphitheatre Parkway
Mountain View, CA 94043-1351

TMA Direct, Inc.
12021 Sunset Hills Road, Suite 350
Manassas, VA 20109

United Parcel Services
P.O. Box 7247-0244
Philadelphia, PA 19170

Membership Advisors Fund Raising
11250 Waples Mill Road, Suite 310
Fairfax, VA 22030

Stone River Gear, LLC
P.O. Box 67
Bethel, CT 06801

Krueger Associates, Inc.
105 Commerce Drive
Aston, PA 19014

CDW Computer Centers, Inc.
P.O. Box 75723
Chicago, IL 60675

Government Agencies

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Office of Attorney General (NY)
Attn: Letitia James
28 Liberty Street
New York, NY 10005

Office of Attorney General (DC)
Attn: Karl A. Racine
441 Fourth St., N.W., Suite 600-South
Washington, DC 20001

Office of Attorney General (TX)
Attn: Ken Paxton
P.O. Box 12548
Austin, TX 78711-2548

Mahmooth A. Faheem
Lori A. Butler
Pension Benefit Guaranty Corporation
1200 K NW
Washington, DC 20005-4026
mahmooth.faheem@pbgc.gov
butler.lori@pbgc.gov
efile@pbgc.gov

Notice of Appearance

Laurie A. Spindler
Linebarger Coggan Blair & Sampson, LLP
2777 N. Stemmons Freeway, Suite 1000
Dallas, TX 75207
dallas.bankruptcy@publicans.com

G. Michael Gruber
Dorsey & Whitney LLP
300 Crescent Court, Suite 400
Dallas, TX 75201
gruber.mike@dorsey.com

Brian E. Mason
Dorsey & Whitney LLP
300 Crescent Court, Suite 400
Dallas, TX 75201
mason.brian@dorsey.com

Natalie L. Arbaugh
Winston & Strawn LLP
2121 N. Pearl Street, Suite 900
Dallas, TX 75201
narbaugh@winston.com

David Neier
Winston & Strawn LLP
200 Park Avenue
New York, NY 10166-4193
dneier@winston.com

Michael I. Baird
Pension Benefit Guaranty Corporation
1200 K St. NW
Washington, DC 20005-4026
baird.michael@pbgc.gov
efile@pbgc.gov

Gerritt M. Pronske
Eric M. Van Horn
Jason P. Kathman
Spencer Fane LLP
2200 Ross Avenue, Suite 4800 West
Dallas, TX 75201
gpronske@spencerfane.com
ericvanhorn@spencerfane.com
jkathman@spencerfane.com

Mark Ralston
Fishman Jackson Ronquillo PLLC
Three Galleria Tower
13155 Noel Road, Suite 700
Dallas, TX 75240
mrалston@fjrpllc.com

H. Joseph Acosta
Dorsey & Whitney LLP
300 Crescent Court, Suite 400
Dallas, TX 75201
acosta.joseph@dorsey.com

Thomas M. Buchanan
Matthew Saxon
Winston & Strawn LLP
1901 L St., N.W.
Washington, DC 20036
tbuchana@winston.com
msaxon@winston.com

Tara LeDay
McCreary, Veselka, Bragg & Allen, P.C.
P.O. Box 1269
Round Rock, TX 78680
tleday@mvalaw.com

Brandon R. Freud
Chuhak & Tecson, P.C.
30 S. Wacker Drive, Suite 2600
Chicago, IL 60606
bfreud@chuhak.com

James Sheehan
Emily Stern
Monica Connell
Office of Letitia James
Attorney General for the State of New York
28 Liberty Street
New York, NY 10005
james.sheehan@ag.ny.gov
emily.stern@ag.ny.gov
monica.connell@ag.ny.gov

Kevin T. White
Director – Legal
Quad/Graphics, Inc.
601 Silveron Blvd., Suite 200
Flower Mound, TX 75028
ktwhite@quad.com

Robert Lapowsky
Stevens & Lee, P.C.
620 Freedom Business Center, Suite 200
King of Prussia, PA 19406
rl@stevenslee.com

Joe E. Marshall
Marshall Law
2626 Cole Avenue, Suite 300
Dallas, TX 75204
jmarshall@marshalllaw.net

M. Jermaine Watson
Joshua N. Eppich
H. Brandon Jones
Clay M. Taylor
J. Robertson Clarke
Bonds Ellis Eppich Schafer Jones LLP
420 Throckmorton Street, Suite 1000
Fort Worth, TX 76102
jermaine.watson@bondsellis.com
joshua@bondsellis.com
clay.taylor@bondsellis.com
brandon@bondsellis.com
robbie.clarke@bondsellis.com

Arthur A. Greenberg
G&B Law, LLP
16000 Ventura Boulevard, Suite 100
Encino, CA 91436-2730
agreenberg@gblawllp.com

Stephen G. Wilcox
Wilcox Law, PLLC
P.O. Box 201849
Arlington, TX 76006
swilcox@wilcoxlaw.com

David W. Giattino
Stevens & Lee, P.C.
919 Market Street, Suite 1300
Wilmington, DE 19801
dwg@stevenslee.com

Duane M. Geck
Donald H. Cram
Severson & Werson, P.C.
One Embarcadero Center, Suite 2600
San Francisco, CA 94111
dmg@severson.com
dhc@severson.com

Judith W. Ross
Ross & Smith, PC
700 North Pearl Street, Suite 1610
Dallas, TX 75201
judith.ross@judithwross.com

Nancy L. Alper
Senior Assistant Attorney General
Office of the Attorney General
for the District of Columbia
400 Sixth Street, N.W., 9th Floor
Washington, DC 20001
nancy.alper@dc.gov

Catherine Jackson
Assistant Attorney General
Office of the Attorney General for
The District of Columbia
400 Sixth Street, N.W. 10th Floor
Washington, DC 20001
catherine.jackson@dc.gov

Leonor Miranda
Assistant Attorney General
Office of the Attorney General For
The District of Columbia
400 Sixth Street, N.W. 10th Floor
Washington, DC 20001
leonor.miranda@dc.gov

D. Brett Marks
Akerman LLP
201 East Olas Blvd., Suite 1800
Fort Lauderdale, FL 33301
brett.marks@akerman.com

Heather M. Crockett
Deputy Attorney General
Indiana Office of Attorney General
302 W. Washington St., IGCS – 5th Floor
Indianapolis, IN 46204
heather.crockett@atg.in.gov

David W. Parham
Akerman LLP
2001 Ross Avenue, Suite 3600
Dallas, TX 75201
david.parham@akerman.com

Walter A. Herring
Robert Blackwell
Blackwell, Blackburn, Herring & Singer LLP
7557 Rambler Road, Suite 1450
Dallas, TX 75231
wherring@bbhslp.com
bblackwell@bbhslp.com